
**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	
	:	
v.	:	<u>CRIMINAL COMPLAINT</u>
	:	
ERVIS GJONI , and	:	Mag. No. 09-3534
GALITANO GJONI, a/k/a "Stafano"	:	

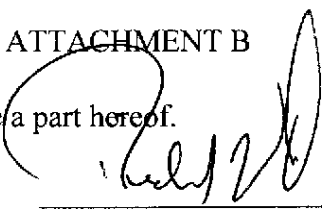
I, Richard N. Orr, being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent of the Federal Bureau of Investigation and that this complaint is based on the following facts:


SEE ATTACHMENT B

continued on the attached pages and made a part hereof.



RICHARD N. ORR, Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,
12, 2009, in the District of New Jersey



HON. MARK FALK
United States Magistrate Judge

ATTACHMENT A

On or about March 3, 2009, in Atlantic County, in the District of New Jersey, and elsewhere, the defendants

ERVIS GJONI
and
GALITANO GJONI

did knowingly and intentionally distribute and possess with the intent to distribute a quantity of 3,4 Methylenedioxymethamphetamine, that is "MDMA" or "ecstasy," a Schedule I controlled substance, and a quantity of Oxycodone, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

ATTACHMENT B

I, Richard N. Orr, a Special Agent with the Federal Bureau of Investigation, having conducted an investigation into the information described below, have knowledge of the following facts:

1. During the course of this investigation, an undercover federal law enforcement officer ("UC1") has posed as an individual involved in a variety of illegal activities, including drug distribution and dealing in stolen goods and contraband cigarettes. UC1 has recorded meetings with defendant ERVIS GJONI ("GJONI") and other targets of this investigation and engaged in covert transactions.
2. On or about March 3, 2009, UC1 met with GJONI and his girlfriend, FNU LNU, AKA Ekaterina at an apartment in Atlantic City. The meeting was consensually recorded on a Closed Circuit Television ("CCTV") system and on audio.
3. GJONI took out a container which he stated contained a sample of 100 ecstasy pills and 100 Percocet pills. Percocet is the brand name for a prescription painkiller that contains oxycodone and acetaminophen (tylenol). GJONI handed the container to UC1.
4. Also during this meeting, GJONI purchased contraband (untaxed and unstamped) cigarettes from UC1. UC1 agreed to reduce the purchase price for the cigarettes in exchange for the approximately 100 ecstasy pills and 100 Percocet pills.
5. On or about March 4, 2009, GJONI called UC1 and stated that he had 2,000 ecstasy pills available for purchase the following week. UC1 agreed.
6. On or about March 5, 2009, UC1 met with FNU LNU, AKA Ekaterina and GALITANO GJONI, AKA "Stefano" ("Stafano") at an apartment in Atlantic City. The meeting was consensually recorded on a Closed Circuit Television ("CCTV") system and on audio. Ekaterina and Stafano, who is GJONI's brother, went to meet UC1 on behalf of GJONI.
7. During this meeting, Stafano and Ekaterina gave UC1 four(4) clear ziplock bags, each containing a quantity of what they represented to be ecstasy pills. They also gave UC1 a ziplock bag containing 100 white in color pills. Later that day UC1 had a telephone conversation with GJONI. During the conversation GJONI told UC1 that the white pills were Xanax. The white pills have not yet been analyzed.
8. A sample from each of the suspected ecstasy pill bags tested positive for MDMA- ecstasy, a schedule I controlled substance.
9. On or about March 7, 2009, UC1 and UC2 went to 19 Marie Street, Apartment 1, Staten Island, NY. There they met GJONI and Stefano. During this meeting UC1 gave GJONI \$4,300.00. In exchange, GJONI and Stefano gave UC1 a ziplock bag containing 10 smaller plastic bags containing purported ecstasy. GJONI and Stefano

also gave UC1 a Poland Springs water bottle containing a clear liquid which GJONI represented to be Special K.

10. A sample from 4 of the 10 bags was field tested. Each tested positive for the presence of MDMA, ecstasy, a schedule I controlled substance. The clear liquid has not yet been identified by chemical analysis.